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February 27, 2005 From: robin\_mayne@hotmail.com%inter2 [robin\_mayne@hotmail.com] on behalf of robin\_mayne@hotmail.com  
Sent: Sunday, February 27, 2005 5:55 PM  
To: Torres, Francine  
Subject: Please Read Below

Francine Torres  
Administrator  
USDA-AMS-TMP-NOP  
1400 Independence Avenue SW  
Room 4008-So, AG Stop 0268  
Washington, D.C. 20250-0200

Dear Francine Torres,

I strongly support the pasture requirements for organic production, as recommended by the National Organic Standards Board. (The board's recommendations, which can be seen below, were issued following the complaint filed by the Cornucopia Institute.)

Please consider the following:

- I support the recommendations from the National Organic Standards Board Livestock Committee from February 1, regarding pasture requirements
- I strongly believe that pasture is good for the health and welfare of cows and other ruminants, and it should not be dropped as a requirement from the organic standards
- That this requirement should be more enforced by the USDA.

The NOSB Livestock Committee recommends the following, and I am hopeful you will agree:

#### 1. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The grazed feed must provide a significant portion of the total feed requirements. The Organic System Plan shall include a timeline showing how the producer will work to maximize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: a) the amount of pasture provided per animal; b) the average amount of time animals are grazed on a daily basis; c) the portion of the total feed requirement that will be provided from pasture; d) circumstances under which animals will be temporarily confined; and e) the records that are maintained to demonstrate compliance with pasture requirements.

#### 2. Temporary Confinement

Temporary confinement means the period of time when ruminant livestock are denied pasture. The length of temporary confinement will vary according to the conditions on which it is based (such as the duration of inclement weather), and instances of temporary confinement shall be the minimum time necessary. In no case shall temporary confinement be allowed as a continuous production system. All instances of temporary confinement shall be documented in the Organic System Plan and in records maintained by the operation.

Temporary confinement is allowed only in the following situations:

- a. During periods of inclement weather, such as severe weather occurring over a period of a few days during the grazing season;
- b. Conditions under which the health, safety, or well-being of an individual animal could be jeopardized, including to restore the health of an individual animal or to prevent the spread of disease from an infected animal to other animals;

RMayne.txt

c.. To protect soil or water quality; or

d.. During a stage of production. [For ruminants, a "stage of production" that warrants temporary confinement from pasture include: a) birthing; b) dairy animals up to 6 months of age; and c) beef animals during the final finishing stage, not to exceed 120 days. Lactation of dairy animals is not a stage of production under which animals may be denied pasture for grazing.]

Please don't Let corporate interests take over organic standards, and take a stand on strongly supporting the pasture requirements for organic production.

Thank you for your consideration.

Very Sincerely,

Robin Mayne

3643 Faust Ave

Long Beach, CA 90808